

EXHIBIT 7

1 SUPREME COURT OF THE STATE OF NEW YORK
2 COUNTY OF NEW YORK : CIVIL TERM : PART 57

3 ----- X
4 HALEIGH BREEST,

5 Plaintiff,

6 -against- Index No.
7 161137/2017

8 PAUL HAGGIS,

9 Defendant.

10 ----- X

11 Supreme Courthouse
12 60 Centre Street
13 New York, New York
14 October 19, 2022

15 B E F O R E:

16 HONORABLE SABRINA KRAUS,

17 Justice, Supreme Court

18 A P P E A R A N C E S:

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Senior Court Reporters

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Direct-Breest-Salzman

1 therapist?

2 A Yes.

3 Q When was the first time you saw a therapist?

4 A It was in 2015.

5 Q Who was that therapist?

6 A Dr. Mindy Zelen.

7 Q How many sessions did you see Dr. Zelen for?

8 A Two or three.

9 Q Why just two or three?

10 A I didn't connect with her. So, it would be impossible
11 to build a trusting therapeutic relationship.

12 Q Why did you seek out therapy with Dr. Zelen at that
13 time?

14 A I wanted to be in a relationship, and I was having
15 difficulty going on dates and not finding them challenging and I
16 had a lot of anxiety.

17 Q Before January 31st, 2013 had you ever had trouble
18 dating before?

19 A No.

20 Q After seeing Dr. Zelen for two or three sessions, did
21 you ever see any other therapist?

22 A Yes, Dr. Baker-Pitts who you met yesterday.

23 Q And when did you first see Dr. Baker-Pitts?

24 A June of 2017.

25 Q How did you find Dr. Baker-Pitts?

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1 Q Can you tell us how they changed?

2 A It felt hard. It no longer felt carefree. I could get
3 nervous being alone with guys.

4 Q Have you had sex since January 31st, 2013?

5 A Yes.

6 Q How many times?

7 A Once.

8 Q When was that?

9 A It was in 2015.

10 Q Why did you do that?

11 A I wanted to see if I could.

12 Q How was that experience for you?

13 A It was awkward and didn't feel comfortable and I had
14 flashbacks.

15 Q What did you have flashbacks of?

16 A Being assaulted.

17 Q Since January 31st, 2013, Ms. Breest, have you ever
18 performed oral sex on a man?

19 A No. That was probably the worst part of that night.

20 MS. CHAUDHRY: Objection.

21 THE COURT: Basis?

22 MS. CHAUDHRY: Nonresponsive.

23 THE COURT: Overruled. The question and answer can
24 stand.

25 Q Have you ever been to South Africa, Ms. Breest?

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1 Q And what is Criterion B and how is it relevant to an
2 assessment of PTSD?

3 A So if you recall earlier, I said that when you're
4 making an assessment for posttraumatic stress disorder, you have
5 to have very specific symptoms. So there are four symptom
6 clusters and you have to have a certain number of symptoms in
7 each symptom cluster in order to qualify for a diagnosis of
8 PTSD. So it is not just measuring how severe or how many
9 symptoms you have. It's also they have to be symptoms of a
10 particular type in order to meet criteria.

11 So this Criterion B, one of the first clusters, if you
12 will, is called the intrusive symptoms and you need to have a
13 minimum of one symptom at least at the moderate level in order
14 to count it towards a diagnosis of PTSD.

15 Q So on the first one we're looking at, B1, what did you
16 find?

17 A I found that Ms. Breest was experiencing unwanted
18 memories of the rape and in particular, she was having intrusive
19 meaning, it is not that she is sitting trying to think of
20 something. It's thoughts that just pop into her head and for
21 her, it was recurrent and intrusive thoughts of Mr. Haggis
22 jamming his penis into her throat repeatedly and her gagging.

23 She described experiencing those thoughts both as just
24 randomly popping into her head or when reminded of something and
25 she said that they bother her a lot. And I conducted further

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1 assessment to determine it is also something that's very
2 difficult for her to get out of her head and it is something
3 that she was experiencing at least daily in the past month.

4 Q Let's go to the bottom of the screen, please, on this
5 page. Item B2 asks about unpleasant dreams, right?

6 A Yes.

7 Q And was that something Ms. Breest scored on?

8 A So this is a good example. She said yes, she does have
9 dreams, but she couldn't remember the content. So I wouldn't
10 link them in any specific way to the rape. So I had to code
11 that symptom as absent.

12 Q Let's go to the next page, page 30. The top screen
13 asks if in the past month there have been times when you
14 suddenly acted or felt as if the event was actually happening
15 again and how did Ms. Breest score on that?

16 A That was a zero. That measure was flashback meaning
17 you're actually having a re-experiencing moment. So you lose
18 touch with time in the present and that was not a symptom that
19 Ms. Breest reported experiencing.

20 Q Next screen, item B4.

21 A Item B4 is something called cues emotional distress.
22 What that means is it asks when you are reminded of something
23 similar to the traumatic event, do you experience emotional
24 distress and again, the person has to be quite specific in terms
25 of what are the kinds of things. For Ms. Breest, in the past

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1 month, had certainly been being asked a lot of highly personal
2 and violating questions, reading transcripts, seeing her name
3 on -- in the news, seeing or hearing, having to have
4 conversations with the lawyers, anything that reminded her of
5 the rape and how much did it bother her.

6 And then to tap the impact, I asked well, all right.
7 So you're saying it bothers you, but, you know, how long does it
8 take you to calm down, what kinds of things do you have to do in
9 order to alleviate that emotional distress. And here, Ms.
10 Breest talked about at times requiring a lot of effort. She
11 would play with her dog. She would try to distract herself.
12 She would say -- try to sooth herself by reminding herself the
13 worst has already happened. It's over. She would try to read
14 if she could and really distract.

15 And then talking about the ways in which dealing with
16 that emotional distress interferes with daily life, so again,
17 Ms. Breest is a very high-functioning person overall, but when
18 you are constantly having to manage intense distress, it
19 requires a lot of emotional energy and a lot of effort. If you
20 think, it's kind of similar if you think about a computer that's
21 running a program in the background. You can still use the
22 computer, but it's not running at optimal efficiency. So that's
23 kind of what -- the sense that I had here.

24 This was a particularly severe symptom for Ms. Breest,
25 meaning that not only was the reaction intense and required a

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1 lot of effort to alleviate her distress, but it was something
2 that happened multiple times a day. When you score on the
3 right-hand side, those are my scorings, my professional scoring
4 of a combination of both frequency and intensity.

5 Q Let's go to the next page, item B5.

6 A Item five is very similar to the previous
7 event -- previous question only in the face of reminders.
8 Instead of asking about emotional distress, it asks about
9 physical reactions. So for Ms. Breest, she reported physical
10 anxiety reactions like having a rush of anxiety that -- with
11 like a pit in her stomach or physical tension, feeling her heart
12 race, things like that in response to a reminder.

13 And again, sometimes she reported that it could take as
14 long as an hour to calm down or she's been prescribed Ativan to
15 take as-needed. And at times, that will be an example of when
16 she would need to take an Ativan just to try to calm her body
17 down.

18 Q So you looked at five items for Criterion B.

19 How many does a patient have to score in order to
20 qualify for a PTSD diagnosis?

21 A Just one.

22 Q How many did Ms. Breest score?

23 A I think three. Three.

24 Q Go into Criterion C, the bottom portion of this page.
25 What is Criterion C assessing?